

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA  
Plaintiff

v.

[1] WALTER PIERLUISI ISERN  
Defendant- Third-Party Plaintiff

v.

MUNICIPIO DE YAUCO  
Third-Party Defendant

CIVIL: 3:24-cv-01334-CVR

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THIRD - PARTY COMPLAINT

I. The Parties of This Complaint:

a. The Plaintiff:

Name: United States of America  
Address: 350 Carlos Chardon St, Suite 1201  
San Juan, Puerto Rico, 00913  
Telephone No. (787) 766-5656

b. The Defendant/Third-Party Plaintiff:

Name: Walter Pierluisi Isern  
Address: P.O. Box 21487, San Juan  
Puerto Rico 00928-1487  
Telephone No. (787) 918-8845

c. The Third-Party Defendant:

Name: Municipio de Yauco  
Address: P.O.Box 01, Yauco  
Puerto Rico, 00698-0001  
Telephone No. (787) 856-1345

II. INITIAL COMPLAINT

1. On July 25, 2024 the United States Attorney office for the District of Puerto Rico filed a complaint against co-defendant [1] Walter Pierluisi Isern and co-defendant [4] American Management and Administration Corporation to collect the 100% of the amount owed of restitution to the United States of America in the criminal case 3:23-cr-00148-CVR. See exhibit 1.

2. Co- defendant [1] Walter Pierluisi Isern filed an answer to the complaint on December 20, 2024. See exhibit 2.

### III. THIRD- PARTY COMPLAINT

3. That Municipio de Yauco owed to Co-defendant [4] American Management and Administration Corporation for work done and not paid the amount of \$ 284,715.37 in relation of the demolition monitoring and debris disposal ( PPDR- FEMA PROGRAM) that American Management and Administration Corporation managed until October 2023.
4. That money is an account receivable and are part of co-defendant [4] American Management and Administration Corporation assets, that are restrained by the Court due to the "Restraining Order" issued by this Court on July 29,2024.
5. That co-defendant [4] American Management and Administartion Corporation are entitled to judgment against the Third-Party Defendant to collect the amount owed.
6. That co-defendant [1] Walter Pierluisi Isern as owner and shareholder of co-defendant [4] American Management and Administration Corporation is entitled to request to this Court judgment against the Third-Party defendant and will be economically affected if this Court denied his petition.
7. That co-defendant[1] Walter Pierluisi isern request to this Court to issue a writ of garnishment against the Third-Party Defendant commanding the Third-Party Defendant to turn over the Plaintiff the amount owed to co-defendant [4] American Management and Administration Corporation to be utilized as part of the restitution payment.

### IV. PRAYER FOR RELIEF

Wherefore, co-defendant[1] Walter Pierluisi Isern prays that this claim be deemed good and sufficient and that after due proceedings are had, that this Court enter a judgment against the Third-Party Defendant and in favor of co-defendant [4] American Management

and Administration Corporation and co-defendant[1] Walter Pierluisi Isern to collect the amount of money owed.

#### V. CERTIFICATION

Under Federal Rules of Civil Procedures, by signing below, I certify to the best of my knowledge, information and belief that this complaint :(1) is not being presented for improper purpose , such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by nonfrivolous argument for extending, modifying or reversing existing law;(3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of process will be executed as per Rule 4 of the Federal Rules of Civil Procedures and email addresses available as to all Third-Party Defendants herein.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, on December 20 , 2024.



Walter Pierluisi Isern  
Pro-se Defendant/Third-Party  
Plaintiff  
P.O. Box 21487, San Juan,  
Puerto Rico, 00928-1487  
Tel: (787) 918-8845